

1. Knowledge about any contracts executed between APTIM and the VIHFA regarding the EHRVI program in effect at the time of the subject incident
2. Knowledge about APTIM's scope of work contained in the contract between APTIM and VIHFA regarding the EHRVI program in effect at the time of the subject incident
3. Knowledge of badging service provided by APTIM in connection with the EHRVI program
4. Knowledge of identity of Tier 1 subcontractors of EHRVI program
5. Knowledge regarding pre program safety training of Tier 1 workers for the EHRVI program
6. Knowledge regarding contracts executed between APTIM and VIHFA regarding scope of work of the EHRVI program
7. Knowledge regarding Navigation Construction's qualifications to serve as subcontractor in the EHRVI program
8. Knowledge regarding Patriot Response Group's qualifications to serve as subcontractor in the EHRVI program
9. Knowledge regarding Navigation Construction's performance history, including APTIM's history with Navigation Construction
10. Knowledge regarding Patriot Response Group's performance history, including APTIM's history with Patriot Response Group
11. Knowledge regarding pre program safety training of Navigation Construction employees on the EHRVI project
12. Knowledge regarding preprogram safety training of Patriot Response Group employees on the EHRVI project
13. Knowledge regarding work agreement between Navigation Construction, LLC and APTIM for work on the EHRVI program
14. Knowledge regarding work agreement between Patriot Response Group and APTIM for work on the EHRVI project
15. Knowledge regarding any automobile liability policy providing coverage for automobiles owned, and hired and non owned, further to any APTIM/Navigation Construction work agreement in effect at the time of the subject car accident
16. Knowledge regarding any indemnity agreement between APTIM/Navigation Construction for work on the EHRVI program
17. Knowledge regarding any indemnity agreement between APTIM/Patriot Response Group for work on the EHRVI program
18. Knowledge of any automobile policy held by Navigation Construction and Patriot Response Group, naming APTIM as an additional insured, containing cross liability endorsements, in effect at the time of the subject car accident
19. Knowledge of each and every document provided by APTIM to Navigation Construction and Patriot Response group in connection with the EHRVI program, in effect at the time of the subject car accident
20. Knowledge regarding the policies or procedures provided by APTIM to workers of Navigation Construction and Patriot Response Group, regarding safety, motor vehicle safety, travel policy, sleep and rest requirements, vehicle inspection, driver standards and hiring requirements that were in effect at the time of the incident, including but not limited to driver safety manuals, driver safety operation procedures, driver safety training manuals/procedures/guidelines
21. Knowledge of all driver manual, safety manual, company handbook or their equivalent issued to Andrew and Nathan McCann by APTIM in connection with the EHRVI project
22. Knowledge of all driver manual, safety manual, company handbook or their equivalent issued by APTIM to Patriot Response Group employees and Navigation Construction employees during all training safety sessions provided by APTIM
23. Knowledge regarding Andrew and Nathan McCann's participation in any training provided by APTIM, in connection with work in the EHRVI program
24. Knowledge of any safety rules, manuals, documents issued to Nathan and Andrew McCann for work in the EHRVI program
25. Knowledge of materials used in APTIM safety training program and classes



26. Knowledge regarding any automobile insurance policy deemed necessary by APTIM to cover risks inherent to work or services being performed by Navigation Construction in effect at the time of the subject incident
27. Knowledge regarding any automobile insurance policy deemed necessary by APTIM to cover risks inherent to work or services being performed by Patriot Response Group in effect at the time of the subject incident
28. Knowledge regarding certificates evidencing required insurance coverage and endorsements which were delivered prior to the commencement of work on the EHRVI program in effect at the time of the subject incident
29. Knowledge regarding Andrew McCann and Nathan McCann's participation in any safety programs provided by APTIM
30. Knowledge of any car accidents involving any of the employees of APTIM's contractor and subcontractors
31. Knowledge of any car accidents involving any individuals who participated in the APTIM safety training program
32. Knowledge of any and all documents setting forth any policies, procedures, guidelines, recommendations or directives regarding driver conduct, driver safety, driver hiring, subcontractor hiring, discipline or firing used by APTIM in effect at the time of the subject incident
33. Knowledge of all training or instructional videotapes, CDs, or DVDs used by APTIM in its training of drivers in the US Virgin Islands
34. Knowledge of entire driver investigation history or its equivalent of Andrew and Nathan McCann
35. Knowledge of all documents reflecting any background check performed on Andrew and Nathan McCann with regard to their employment history or job references, including letters of reference
36. Knowledge of any background check performed on Nathan and Andrew McCann with regard to their driver's record and criminal history (including, but not limited to traffic tickets, incidents and prior employment)
37. Knowledge of any employment application filled out or signed by Nathan and Andrew McCann to work on the EHRVI program
38. Knowledge of any investigations performed by APTIM on Navigation Construction and Patriot Response Group regarding safety history, fitness of subcontractor employees, their accident history, drug and alcohol testing and vehicle maintenance
39. Knowledge of all documents reflecting any background check performed on Navigation Construction and Patriot Response Group, prior to the date of the subject incident
40. Knowledge regarding APTIM's scope of services, further to its contract with VIHFA for work on the EHRVI program
41. Knowledge regarding the relationship between APTIM and Patriot Response Group
42. Knowledge regarding the relationship between APTIM and Navigation Construction
43. Knowledge of whether APTIM has a background check policy
44. Knowledge of APTIM employment background check policy
45. Knowledge about how Andrew McCann obtained an APTIM badge for work on the EHRVI program, including when it was issued and whether it was revoked/returned to APTIM
46. Knowledge about how Nathan McCann obtained an APTIM badge for work on the EHRVI program, including when it was issued and whether it was revoked/returned to APTIM
47. Knowledge about the safety programs and classes initiated, maintained and supervised by APTIM for Tier 1 employees on the EHRVI program
48. Knowledge of any APTIM transportation policy in effect for work on the EHRVI project between Sept. 21, 2018 and November 30, 2018
49. Knowledge of any Tier 1 transportation policy for work on the EHRVI project in effect between September 21, 2018 and November 30, 2018
50. Knowledge of the travel, lodging, local transportation provided by APTIM for management and trade labor in effect between September 21, 2018 and November 30, 2018

51. Knowledge of APTIM's payments for transportation for the proper execution of its work on the EHRVI program
52. Knowledge of APTIM's pass through costs for shipping vehicles too and from the Virgin Islands for work on the EHRVI program

Documents

- a. All documents, manuals, tapes, DVDs distributed to workers as part of the pre program safety program and classes for Tier One workers on the EHRVI program
- b. Contract between APTIM and VIHFA for work on the EHRVI program, describing badging process and scope of APTIM's service in effect at the time of the subject incident
- c. All Contracts between APTIM and Navigation Construction for work on the EHRVI program in effect at the time of the subject incident
- d. All Contracts between APTIM and Patriot Response Group for work on the EHRVI program in effect at the time of the subject incident
- e. All Patriot Response Group Insurance policies naming APTIM as an additional insured for any automobile, including owned, hired and non hired, in effect at the time of the subject incident
- f. All Navigation Construction Insurance policies naming APTIM as an additional insured for any automobile, including owned, hired and non hired in effect at the time of the subject incident
- g. All certificates received from Patriot Response Group evidencing required insurance coverage, further to section 22 of the Contract between Patriot Response Group and APTIM, in effect at the time of the subject incident
- h. All certificates received from Navigation Construction evidencing required insurance coverage, further to section 22 of the Contract between Navigation and APTIM in effect at the time of the subject incident
- i. All documents regarding all background checks performed on Navigation Construction, Patriot Response Group, Andrew McCann and Nathan McCann for work on the EHRVI project
- j. All written or otherwise recorded statements to include witness statements in connection with the car accident that is the subject of this lawsuit
- k. All documents regarding any background check performed by Navigation Construction and Patriot Response Group on Andrew McCann and Nathan McCann's safety history, driver fitness, accident history, drug and alcohol testing and vehicle maintenance
- l. All documents relating to Andrew McCann's and Nathan McCann's participation in the safety programs and classes offered to Tier 1 workers , for work on the EHRVI program
- m. All documents regarding any background check performed by APTIM on Andrew McCann and Nathan McCann's safety history, driver fitness, accident history, drug and alcohol testing and vehicle maintenance
- n. All documents regarding all APTIM transportation policies in effect for work on the EHRVI project
- o. All materials used in the APTIM safety training for Tier One contractors
- p. Employment applications executed by Nathan and Andrew McCann for work on the EHRVI project
- q. Certifications received by APTIM from Tier One contractors on the EHRVI program, evidencing an understanding of local conditions and conditions under which work performed
- r. All certifications issued by APTIM evidencing its understanding of local conditions and conditions under which work is performed for the EHRVI program
- s. All documents evidencing APTIM's coordination of transportation for Tier 1 contractors on the EHRVI project